


governs the procedure in civil actions removed from the state courts to the United States District Courts. Rule 81(c) first provides that the Federal Rules of Civil Procedure apply to removed cases. The Rule goes on to prescribe certain periods for the service of an answer or other defenses. The governing time period under Rule 81(c) may be as short as five days after removal. Plaintiff's complaint is brought under 28 U.S.C. § 2410 as an action affecting property on which the United States has a lien. Pursuant to 28 U.S.C. § 2410(b), the United States may appear and answer, plead or demur within sixty days after service or such other time as the court may allow. See 28 U.S.C. § 2410(b). The undersigned trial counsel represents that more than five days are required to prepare and to serve an appropriate response raising the defenses of the United States. The period of additional time requested is commensurate with the sixty-day period permitted under 28 U.S.C. § 2410(b), as service was made on the United States on February 10, 2005.

Therefore, the United States requests the appropriate sixty-days in which to answer or otherwise respond to the complaint, up to and including April 11, 2005.

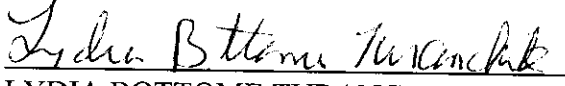
I hereby certify that a true copy of the above document was served upon (each party appearing pro se and) the attorney of record for each other party by mail on

March 10, 2005


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Respectfully submitted,

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